



February 10, 2014

Secretary Richard K. Sullivan, Jr.
Executive Office of Energy and Environmental Affairs (EEA)
Attn: Anne Canaday
100 Cambridge Street, Suite 900
Boston MA 02114

RE: Comments on the EIR for Wynn Everett, MEPA #15060

Dear Secretary Sullivan:

WalkBoston offers the following comments on the Wynn Everett Draft Environmental Impact Report. While we are pleased to see that the DEIR includes the proposal for the harbor walk and water transportation docking facilities, we are concerned about the traffic impacts and the lack of sufficient preparation for pedestrian access to the site. Improved pedestrian access is crucial to encouraging transit use as a significant travel choice for both employees and patrons.

Our comments are organized around two key issues: (1) enhancing and encouraging walking and transit, (2) mitigating the impacts of auto trips.

Enhancing and encouraging walking and transit

An Everett casino should be viewed through the lens of an urban re-development project that fits within its neighborhood and enhances the lives of its neighbors as well as its patrons and employees. In order to do that, the development should maximize the number of transit and walking trips, and minimize the number of auto trips.

1. Transit access and emphasis.

As currently planned, primary subway transit access will be provided by the Orange Line Sullivan Square MBTA Station which is about .75 miles from the site. Transit stations at Wellington and Assembly Square are each over 1.5 miles from the site, and currently have indirect, time-consuming pedestrian routes to the proposed casino. Transit should be encouraged through a number of different carrots and sticks.

- Bus service should be enhanced by improving nearby bus stops or providing subsidies to provide additional service for nearby routes. The safe use of bus stops on the far side of Route 99 is especially important to consider; the proponent should assure that there are traffic signals at all bus stops to provide safe passage for pedestrians crossing at these locations.
- Providing an off-site, transit-convenient and/or shuttle-served location for parking used by the majority of employees is one important option. The connection of proponent- or operator-controlled shuttles to these locations will reduce the impact of vehicles at the access points into the site. To attract patrons to use the bus, the proponent may want to experiment with shuttles that are attractive and “fun.”
- The proponent has included shuttle buses to nearby subway stations and to off-site parking lots. Frequency of the proposed service should allow Orange Line and bus riders to be served within very short (maximum 15-minute) wait times. All

- shuttle services should be made free for employees and patrons.
- The proponent and operator of the casino should price parking spaces to discourage parking during all times of day and evening during which transit service is available.
- Carpooling should be encouraged and subsidized for employees who live outside the MBTA service area or who work late-night shifts.
- The proponent should subsidize ferry services to make use of the proposed water transportation facility.
- The proponent should establish a transportation management organization that can efficiently deal with transit encouragement through subsidized transit passes, and other means that encourage the use of transit.
- Monitoring and reporting on the successes of the proponent and operator of the site in reducing vehicular traffic should be undertaken on an annual basis for the first 10 years of use of the new facilities.

2. Pedestrian access improvements

- Significant improvement of pedestrian access to Sullivan Station should be included in the proponent's transportation mitigation plan. Access for pedestrians along Lower Broadway remains a concern. When Route 99/Broadway was reconstructed by the state, new bicycle lanes were added in both directions, but the existing sidewalks were narrowed to permit expansion for other transportation modes. The proponent should detail the ways in which sidewalks will be upgraded for pedestrian access into the site. Improved sidewalk access should extend at least as far as the MBTA Sullivan Square Station, which will require the proponent to work closely with the City of Boston.
- The new intersections serving the site should be carefully planned to include safety measures for pedestrian crossings. This should include pedestrian phase timing at these and other signalized intersections constructed or modified as part of the proposal.
- The potential new pedestrian and bicycle connection that the proponent proposes to create an approximately .75 mile direct route between the site and Santilli Circle - is intended to encourage pedestrian traffic. The proponent should be required to continue its work with the DCR and the MBTA to assure that this very short, relatively inexpensive connection actually gets constructed. The proponent should promote use of this route to encourage its use.
- A connection between the site and the City of Somerville could be provided by access over the Amelia Earhart Dam. This connection would lead to both the new Assembly Square MBTA Station and to the Somerville/Charlestown Mystic River path network. A connection across the dam could make the Assembly Square station the closest transit access point for the site. The proponent should work with the cities, as well as the DCR and the MBTA (owners of the land) to see whether this long sought pedestrian amenity that would link the extensive riverfront path networks on the two sides of the river, could be provided by the project.
- A concept plan for the streetscape in Everett has been mentioned. We trust that the plan, if developed, will be generous in its recommendations for pedestrian access.

Mitigating/managing the impacts of auto trips

We are concerned that the location of the site and its considerable distance from centers of population and regional transit stations will result in motor vehicles providing the majority of the access to the site, as the proponent has stated. The emphasis on access for vehicular traffic via Broadway leads to potentially difficult traffic concentrations – not only for Broadway, but also for Sullivan Square and the Sweetser Circle at Route 99/16. Both of these locations are already challenged by daily traffic patterns and the addition of casino traffic would seem to bring new and extensive challenges.

All of the access via Sullivan Square will deeply affect the Charlestown neighborhood and its plans for improvements at Sullivan Square. The proponent should work closely with residents of Charlestown and the City of Boston to reach an improved understanding of potential traffic volumes and impacts and the methods that might be used to partially mitigate the effects on the neighborhood. This should include traffic data collection and analysis, and detailed work with the City of Boston to review and assess all options for mitigating the impacts that casino related traffic will have on city streets, intersections and sidewalks. A community agreement between the City of Boston and the proponent should be reached prior to further planning.

Thank you for considering our comments. Please feel free to contact WalkBoston with questions you may have.

Sincerely,



Robert Sloane
Senior Project Manager